

**OFFICIAL FILE  
ILLINOIS COMMERCE COMMISSION**

**ORIGINAL**

**STATE OF ILLINOIS  
ILLINOIS COMMERCE COMMISSION**

ILLINOIS  
COMMERCE COMMISSION

Apr 11 11 01 AM '00

WPS ENERGY SERVICES, INC. :  
: :  
Application for Certificate of Service : Docket No. 00-0199  
Authority under Section 16-115 of :  
the Public Utilities Act. :

CHIEF CLERK'S OFFICE

**PETITION FOR LEAVE TO INTERVENE OF  
COMMONWEALTH EDISON COMPANY**

Commonwealth Edison Company ("ComEd"), by its attorneys, Hopkins & Sutter, hereby petitions for leave to intervene and participate as a party in this proceeding pursuant to 83 Ill. Admin. Code § 200.200. In support of its petition to intervene, ComEd states as follows:

1. ComEd is a public utility company engaged in generation, transmission, distribution and sale of electricity for use in Illinois.

2. On March 2, 2000, WPS Energy Services, Inc. ("WPS-ESI") filed an application for a Certificate of Service Authority under Section 16-115 of the Public Utilities Act. In its application, WPS-ESI indicated its intent to offer power and energy supply to serve non-residential retail customers in the entire State of Illinois, including customers in the territory which ComEd provides generation, transmission, distribution and sale of electricity for use in Illinois.

3. As an Illinois public utility engaged in the generation, transmission, distribution and sale of electricity in the service territory in which WPS-ESI seeks to serve customers, ComEd has a substantial interest in, and is likely to be affected by, any decision made by the Illinois Commerce Commission in this proceeding.

4. In addition, at a meeting of the Illinois Commerce Commission on April 4, 2000, certain commissioners expressed interest in comments of affected utilities, and particularly ComEd, with respect to WPS-ESI's application for a certificate of service authority pursuant to Section 16-115 of the Act. ComEd understands that the Commission is operating within the time frame set forth by statute, and needs to issue a decision by April 24, 2000. ComEd is preparing its comments expeditiously and should be able to submit them within the next few days.

5. No other party can adequately represent ComEd's interests in this proceeding.

6. ComEd requests that the following individuals be placed on the official service list and receive copies of all pleadings, notices and correspondence in this proceeding:

Christopher W. Zibart  
Heather Jackson  
HOPKINS & SUTTER  
70 West Madison Street, Suite 4100  
Chicago, Illinois 60602  
Phone: (312) 558-6600  
Fax: (312) 558-6537  
E-mail: czibart@hopsut.com  
hjackson@hopsut.com

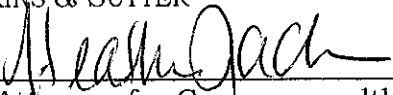
E. Glenn Rippie  
COMMONWEALTH EDISON  
125 South Clark Street  
Chicago, Illinois 60603  
Phone: (312) 394-4200  
Fax: (312) 394-3950  
E-mail: E.Glenn.Rippie@ucm.com

WHEREFORE, ComEd prays that the Hearing Examiner grant ComEd leave to intervene and participate as a party in this proceeding.

Dated: April 10, 2000

Respectfully submitted,

HOPKINS & SUTTER

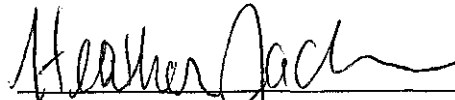
By:   
Attorney for Commonwealth  
Edison Company

Christopher W. Zibart  
Heather Jackson  
HOPKINS & SUTTER  
70 West Madison Street  
Suite 4100  
Chicago, Illinois 60602  
(312) 558-6600

STATE OF ILLINOIS     )  
                                      ) SS.  
COUNTY OF COOK     )

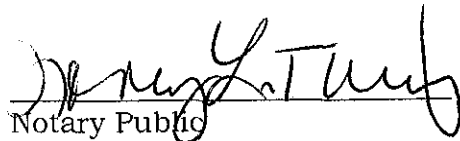
**VERIFICATION**

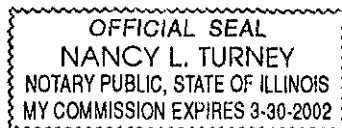
I, Heather Jackson, being first duly sworn, state that I am an attorney for Commonwealth Edison Company, that I am authorized to make this Verification on its behalf, that I have read the foregoing Petition For Leave To Intervene of Commonwealth Edison Company, that I have knowledge of the facts stated therein, and that the same are true and correct to the best of my knowledge, information and belief.

  
\_\_\_\_\_  
Heather Jackson

Attorney for Commonwealth Edison  
Company

SUBSCRIBED and SWORN to before me  
this 10<sup>th</sup> day of April, 2000.

  
\_\_\_\_\_  
Notary Public



**STATE OF ILLINOIS**  
**ILLINOIS COMMERCE COMMISSION**

WPS ENERGY SERVICES, INC.	:	
	:	
Application for Certificate of Service	:	Docket No. 00-0199
Authority Under Section 16-115 of	:	
the Public Utilities Act.	:	

**NOTICE OF FILING**

To: See attached service list

PLEASE TAKE NOTICE that on this date we have filed with the Chief Clerk of the Illinois Commerce Commission, 527 East Capitol Avenue, Springfield, Illinois 62701, the original and two copies of Commonwealth Edison Company's Petition For Leave To Intervene.

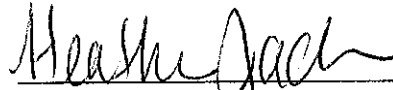
Dated: April 10, 2000

By: Heather Jackson  
An Attorney for Commonwealth  
Edison Company

Christopher W. Zibart  
Heather Jackson  
Hopkins & Sutter  
70 West Madison Street  
Suite 4100  
Chicago, Illinois 60602  
(312) 558-6600

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the Petition For Leave To Intervene of Commonwealth Edison Company upon the persons on the attached service list, served as indicated, on this 10<sup>th</sup> day of April, 2000.

  
Heather Jackson

Attorney for Commonwealth Edison  
Company

**ICC Docket No. 00-0199**  
**Service List**

Hearing Examiner Larry Jones  
ILLINOIS COMMERCE COMMISSION  
527 East Capitol Avenue  
Springfield, Illinois 62701  
**(Federal Express)**

Eric Robertson  
LUEDERS, ROBERTSON & KONZEN  
1939 Delmar Avenue  
Granite City, Illinois 62040  
**(Federal Express)**

Chris Matthiesen & Mark Radtke  
WPS ENERGY SERVICES, INC.  
677 Baeten Road  
Green Bay, Wisconsin 54304  
**(Federal Express)**